



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS:ICR  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 15, 2019

By Email and ECF

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Re: United States v. Dan Zhong  
Criminal Docket No. 16-614 (AMD)

Dear Counsel:

Enclosed are the following materials:

- The government is producing English translations of two Chinese-language emails that were inadvertently omitted when the government produced translations of attachments to the emails. The translations Bates-stamped TR001270A and TR001975A reflect translations of single-page Chinese-language source emails previously produced to the defendant under Bates numbers ESI00044040 and ESI00040387, respectively.
- The government is producing four photographs of the interior of an apartment located on Beech Avenue at which the defendant's employees performed renovation work in violation of the terms of their visas. (DZ069947-DZ069950).
- The government is producing six photographs taken in the vicinity of the construction site at 304 Fifth Avenue in Manhattan on various dates, that were provided to the government by a witness earlier today. (DZ069951-DZ069956).

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Ian C. Richardson  
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Enclosures (TR001270A, TR001975A)  
(DZ069947-DZ069956)

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)